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5 Attorney for **Benjamin D. Morrow**  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA

11 Case No. 3:19-cr-00041-MMD-WGC

12 Plaintiff,  
13 vs.  
14 BENJAMIN D. MORROW  
15 Defendant.

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18  
**ORDER GRANTING PETITIONER  
MORROW'S UNOPPOSED MOTION  
AND DECLARATION IN SUPPORT  
THEREOF FOR EXTENSION OF TIME  
TO FILE TRAVERSE**

19 **MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO OBJECTIONS**

20 Pursuant to Rule 6 of the *Federal Rules of Civil Procedure*, counsel for Petitioner hereby  
21 requests a 60-day extension of time to file Petitioner's Traverse up to and including Monday,  
22 June 2, 2025.

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PETITIONER MORROW'S UNOPPOSED MOTION AND DECLARATION IN SUPPORT THEREOF FOR  
EXTENSION OF TIME TO FILE TRAVERSE  
*United States v. Morrow;*  
3:19-cr-00041-MMD-WGC

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2                   DECLARATION IN SUPPORT OF MOTION  
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4                   I, Jason T. Campbell, am the attorney of record for Petitioner Benjamin Morrow in this  
5 case. I hereby declare as follows in support of this request for extension of time to file  
6 Petitioner's Traverse:

7                   1.     Current due date:    April 2, 2025

8                   On November 12, 2024, I filed a motion to vacate his conviction and sentence pursuant to  
9 28 U.S.C. § 2255 on behalf of Petitioner. (Dkt. 144.) I simultaneously moved to be admitted to  
10 this jurisdiction *pro hac vice* in order to continue representing Petitioner in these proceedings,  
11 and the Court granted my motion on November 26, 2024. (Dkt. 143, 152.)

12                   On December 31, 2024, the Court issued an order to show cause, setting March 3, 2025,  
13 as the due date for the Government's response, with Petitioner's Reply/Traverse due 30 days  
14 later. (Dkt. 156.) The Government filed its response on March 3, 2025, making April 2, the  
15 current due date for Petitioner's Reply/ Traverse.  
16

17                   2.     Length of Requested Extension:                                  60 days

18                   3.     New due date if extension granted:                                  June 2, 2025

19                   4.     Number of previous extensions by Petitioner:                          0

20                   5.     Reason for extension request:

21                   Due to other urgent matters, I have been unable to give this case the attention it requires.  
22 On March 23, 2025, I filed a 35-page brief in a habeas case challenging a first-degree murder  
23 conviction in the Contra Costa Superior Court. (*People v. Jacobson*, Case No. 05-00180125-7.) I  
24 have also spent a substantial amount of time preparing for a multiple-day civil contempt hearing  
25  
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27                   PETITIONER MORROW'S UNOPPOSED MOTION AND DECLARATION IN SUPPORT THEREOF FOR  
28 EXTENSION OF TIME TO FILE TRAVERSE

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1 in San Mateo Superior Court, including the preparation of two briefs on complex constitutional  
2 issues. (*Baptiste v. Goguen*, Case No. CIV-53769.)

3 Given my current schedule, which includes a 10-day vacation in April with my daughter  
4 to visit family, I don't believe I can realistically complete the brief until on or about June 2,  
5 2025.

6. Opposing party's position: No objection

7 On March 27, 2025, I emailed opposing counsel, Nadia Ahmed, and informed her of my  
8 intention to request an extension of time to file a Traverse. Ms. Ahmed stated she had no  
9 objection to my request.  
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13 Respectfully Submitted,  
14

15 Dated: March 28, 2025 /s/ Jason T. Campbell  
16 Jason T. Campbell  
17 Attorney for Benjamin Morrow

18 IT IS SO ORDERED  
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20 DATED this 31st day of March 2025.  
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Miranda M. Du, U.S. District Judge  
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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court, Northern District of California by using the appellate CM/ECF system on March 28, 2025. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system. Executed on March 28, 2025, in El Cerrito, California.

/s/ Jason T. Campbell  
Jason T. Campbell  
Attorney for Benjamin Morrow

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